elevation station creates an even greater difference between the acceptable or reliable service area of a site and compliance with the proposed border standard.

A 22 dBu border limitation will also impact an EMSP licensee's ability to achieve 40 dBu coverage of 80 percent of the population or land area of the MTA. The proposed border standard could effectively prevent a licensee from covering a large portion of the MTA with its 40 dBu contours.41/ Although the Notice may address this kind of problem by permitting a licensee to exceed the 22 dBu border limit with the consent of adjacent co-channel licensees, this could be difficult and complex and require a licensee to resolve conflicts with multiple EMSP systems in adjoining areas.

Fleet Call suggests that a better approach would be to require EMSP licensees not to exceed 40 dBu at the border of an EMSP (MTA) licensing area. This would permit reliable service up to the border area. Adjacent co-channel systems would be required to coordinate their frequency use plans to provide co-channel protection between adjacent EMSPs, as well as with other co-channel facilities, and to resolve any co-channel interference problems.42/ This approach is similar to that required among

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41/ In the worst case scenario, the 22 dBu contour of a 1,000 watt, 1,000 foot site is 63 miles -- creating a 126 mile diameter circle around the site of which only 22 percent can be covered by the station's 40 dBu reliable service contour.

42/ Under this approach, no extension of 40 dBu (reliable service) contour into an adjacent EMSP licensee's service area would be permitted without the its consent.

cellular radio licensees pursuant to Section 22.902(d) of the Commission's Rules. It has generally worked well and fostered cooperation among adjacent licensees.43/

As this discussion demonstrates, development of effective co-channel separation standards is essential to the satisfactory operation of EMSP wide-area systems, as well as the continuing operations of existing co-channel licensees both within and outside the borders of each MTA. Fleet Call believes that additional information is necessary to optimally revise the Commission's existing co-channel separation standards to provide sufficient protection to existing licensees as digital SMR facilities are put into service. Commenters in the short spacing rulemaking in PR Docket No. 93-60 have recognized that a more sophisticated propagation analysis is necessary to understand and account for the interference ramifications of new digital modulation schemes and the possible impact of "multiple interferers" in an increasingly mixed environment of high and multiple low power SMR

43/ The Commission recently adopted a formula for determining distance to the contour for Part 22 cellular radio operators, in lieu of the traditional Carey curve propagation standard. See Section 22.903(c) of the Rules. Use of the formula avoids differing interpretations of the propagation curves. A variant of this formula, or similar improved propagation prediction methodology, may be appropriate for SMRs given the importance of more precise co-channel interference criteria to assure satisfactory operation of wide-area digital SMR systems. This is an example of why the Commission should not revise the current 40/22 Table of Section 90.621(b) without the results of digital SMR operations.

stations.44/ Commenters in that proceeding have also expressed concern that the R-6602 curves underlying current SMR co-channel spacing do not sufficiently account for terrain variances and are thus inaccurate in many circumstances.45/ Accordingly, Fleet Call recommends that the Commission -- while moving forward expeditiously to adopt EMSP licensing -- retain the existing co-channel separation requirements in Section 90.621(b) on an interim basis pending the development of more reliable empirical data and propagation models upon which to base improved interference protection parameters.46/

IV. CONCLUSION

Fleet Call is pleased to provide these comments supporting the Commission's EMSP licensing proposal. It offers a viable approach to expediting the licensing of advanced wide-area SMR systems with greatly reduced administrative costs and delays. In doing so, it would facilitate the development of regional and even nationwide advanced digital SMR networks providing high-quality competitive wireless communications services to the public.

44/ See e.g., Comments of Motorola, Inc. in PR Docket No. 93-

For these reasons, Fleet Call urges the Commission to expeditiously adopt the EMSP licensing scheme with the modifications discussed herein. EMSP licenses should be granted on an MTA-wide basis and initial eligibility should be limited to existing licensees in the MTA. EMSP applicants should be able to apply to reuse all of their constructed and operational channels in the MTA as well as unconstructed channels licensed pursuant to an existing wide-area authorization. Existing licensees obtaining EMSP licenses should not be subject to any restrictions on license transferability, but should be required to implement advanced technology at least six times more efficient than trunked analog SMR systems.

Finally, given the importance of effective co-channel interference standards in the development of EMSP systems, the Commission should defer its proposal in PR Docket No. 93-60 to revise the existing 40/22 dBu Table in Section 90.621(b) of the Rules pending evaluation of the real world performance of digital SMR systems and development of more precise propagation prediction methodologies.

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Dated: July 19, 1993

CERTIFICATE OF SERVICES

I hereby certify that a copy of the foregoing Comments of Fleet Call, Inc. has been mailed by United States first class mail, postage prepaid, this 19th day of July 1993, to the following:

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